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Attorneys for MCA Fund ADV Inc.

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re

THE LITIGATION PRACTICE GROUP,
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8-25-ap-01192-SC

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

Complaint Filed: March 18, 2025
The Honorable Scott C. Clarkson

RICHARD A. MARSHACK, Trustee of
the LPG Liquidation Trust,

Plaintiff,

vs.

DELPHINE PASTOR, et al.,

Defendants.

1 **PLEASE TAKE NOTICE** that Plaintiff and Chapter 11 Trustee Richard A. Marshack
2 (the “Trustee”) and Defendant MCA Fund ADV Inc. (“MCA,” together with the Trustee, the
3 “Parties”), hereby stipulate and agree (the “Stipulation”), through their respective counsel, as
4 follows:

5 A. On March 18, 2025, Plaintiff filed a Complaint for: (1) avoidance, recovery, and
6 preservation of 2-year actual fraudulent transfers, (2) avoidance, recovery, and preservation of 2-
7 year constructive fraudulent transfers, (3) avoidance, recovery, and preservation of 4-year actual
8 fraudulent transfers, (4) avoidance, recovery, and preservation of 4-year constructive fraudulent
9 transfers, (5) turnover, (6) Racketeer Influenced and Corrupt Organizations Act violations, (7)
10 conspiracy, (8) aiding and abetting, and (9) declaratory relief. [Docket. No. 1].

11 B. On March 31, 2025, Plaintiff served MCA with a copy of the Summons and
12 Complaint. [Docket No. 7].

13 C. The deadline for MCA to respond to the Complaint is April 28, 2025. [Docket No.
14 5].

15 D. On April 25, 2025, to allow MCA time to finalize retention of counsel and prepare
16 a response, Plaintiff agreed to extend the deadline for MCA to file and serve any response to
17 Plaintiff’s Complaint from April 28, 2025 to **May 12, 2025**.

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STIPULATION

WHEREFORE, based on the above and the foregoing, the Parties stipulate and agree as follows:


1. The deadline for MCA Fund ADV Inc. to file and serve any response to Plaintiff's Complaint shall be extended from April 28, 2025 to **May 12, 2025**.

IT IS SO STIPULATED.

Dated: April 28, 2025

DINSMORE & SHOHL LLP

By


Christopher B. Ghio
Special Counsel to Richard A. Marshack,
Trustee of the LPG Liquidation Trust

Dated: April 28, 2025

PACHULSKI STANG ZIEHL & JONES LLP


By

/s/ Ira D. Kharasch
Ira D. Kharasch

Dated: April 28, 2025

**MORVILLO ABRAMOWITZ GRAND IASON &
ANELLO P.C.**

By


Christopher B. Harwood (*pro hac vice* application
forthcoming)

Attorneys for MCA Fund ADV Inc.